

KW LAW, LLP  
Andrea S. Tazioli, SBN 026621  
6122 N. 7th St., Suite D  
Phoenix, AZ 85014  
Telephone: (602) 609-7367  
[andrea@kwlaw.co](mailto:andrea@kwlaw.co)

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
Roberto J. Gonzalez (*pro hac vice*)  
Jake E. Struebing (*pro hac vice*)  
2001 K Street, NW  
Washington, DC 20006  
Telephone: (202) 223-7300  
Facsimile: (202) 223-7420  
[rgonzalez@paulweiss.com](mailto:rgonzalez@paulweiss.com)  
[jstruebing@paulweiss.com](mailto:jstruebing@paulweiss.com)

*Attorneys for Defendants Binance Capital Management Co., Ltd.,  
Changpeng Zhao, Yi He, and Ted Lin*

[Additional Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Ryan Cox, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

CoinMarketCap OpCo, LLC; Binance Capital  
Management Co., Ltd. d/b/a Binance and  
Binance.com; BAM Trading Services Inc. d/b/a  
Binance.US; Changpeng Zhao; Catherine Coley;  
Yi He; Ted Lin; and Does I-X;

Defendants.

Case No. 21-cv-08197-PCT-SMB

**JOINT STIPULATION FOR  
SCHEDULING ORDER**

Plaintiff Ryan Cox (“Plaintiff”) and Defendants Changpeng Zhao, Yi He, and Ted Lin (collectively, the “Individual Defendants” and, together with Plaintiff, the “Parties”), by and through their undersigned counsel of record, respectfully submit this Joint Stipulation for a Scheduling Order, as follows:

1 WHEREAS, on September 13, 2021, Plaintiff filed a putative class action complaint (the  
2 “Complaint”) in the above-referenced action (the “Action”);

3 WHEREAS, on November 5, 2021, the Court entered a scheduling order applicable only  
4 to Corporate Defendants and not the Individual Defendants (ECF No. 17);

5 WHEREAS, counsel for the Parties having conferred regarding a schedule for responding  
6 to the Complaint, the Parties agree that a coordinated briefing schedule for any motion(s) to  
7 dismiss will best facilitate the just and efficient progress of the Action and use of this Court’s  
8 and the Parties’ resources.

9 NOW, THEREFORE, the Parties hereby stipulate and agree, subject to the Court’s  
10 approval as follows:

11 1. The deadline for the Individual Defendants to respond to the Complaint shall be  
12 May 23, 2022.

13 2. Should the Individual Defendants move to dismiss the Complaint, Plaintiff shall  
14 file his opposition to the motion to dismiss within sixty (60) days of the filing of the motion to  
15 dismiss; and the Individual Defendants shall file a reply brief within thirty (30) days of the filing  
16 of Plaintiff’s opposition.

17 3. The Individual Defendants do not waive any of their available rights, defenses, or  
18 objections, by agreeing to and/or filing this Joint Stipulation for Revised Scheduling Order.

19 **IT IS SO STIPULATED.**

20  
21 Dated: April 12, 2022

22 By: /s/ Andrea S. Tazioli  
23 Andrea S. Tazioli, SBN 026621  
24 KW LAW, LLP  
25 6122 N. 7th St., Suite D  
26 Phoenix, AZ 85014  
27 Telephone: (602) 609-7367  
28 [andrea@kwlaw.co](mailto:andrea@kwlaw.co)

Roberto J. Gonzalez (admitted *pro hac vice*)  
Jake E. Struebing (admitted *pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP  
2001 K Street NW  
Washington, DC 20006  
(202) 223-7300  
rgonzalez@paulweiss.com  
jstruebing@paulweiss.com

*Attorneys for Defendant  
Binance Capital Management Co., Ltd.,  
Changpeng Zhao, Yi He, and Ted Lin*

By: /s/ George Wentz, Jr. (with  
permission)  
George Wentz, Jr. (admitted *pro hac  
vice*)  
THE DAVILLIER LAW GROUP, LLC  
414 Church St., Suite 308  
Sandpoint, ID 83864  
(208) 920-6140  
gwentz@davillierlawgroup.com

Alexander Kolodin  
THE DAVILLIER LAW GROUP, LLC  
3443 N. Central Ave., Suite 1009  
Phoenix, AZ 85012  
(602) 730-2985  
akolodin@davillierlawgroup.com

*Attorneys for Plaintiff  
Ryan Cox*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 12, 2022, I electronically submitted the foregoing document to the Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants on record.

/s/ Sarah Flaaen